

Exhibit E

From: [Victor Careaga](#)
To: [Robert Kuntz](#); [Patrick Lanciotti](#); KChesebro@napolilaw.com; [Angelica Mecias](#); [Frank Rodriguez](#); [Paulino Nunez](#); [Jorge A. Mestre](#); [Andres Rivero](#)
Subject: [EXTERNAL] My deposition in connection with Case 1:22-mc-21115 -JAL In Re: The Renco Group, Inc. and the Doe Run Resources Corporation
Date: Monday, March 6, 2023 1:48:30 PM

This Message originated outside your organization.

Dear Mr. Kuntz,

Undoubtedly, there has been a lot of back and forth between yourself and counsel for the Plaintiffs in the last few days addressing the issues related to the taking of my deposition, and whether it should proceed *tomorrow*.

Based on all the emails exchanged which I have read, I am extremely uncomfortable appearing for deposition until such time as the Court addresses and resolves the issues both sides have taken. This said, and as Mr. Rodriguez represented, I stand ready and willing to appear for deposition within ten (10) days of receiving the Court's guidance.

Please understand *my* position. I know you and your clients are eager to proceed. Waiting just a few more days should not prejudice anyone. In fact, it seems the interests of justice would be best served this way.

I thank you in advance for your understanding and cooperation.

Very truly yours,

Victor A. Careaga